

IN THE UNITED STATES DISTRICT COURT
FOR THE PENNSYLVANIA DISTRICT OF PENNSYLVANIA

TANIELLE SHURNEY,

Plaintiff,

Civil Action No. 05-196 Erie

vs.

SCOTT'S ECONO INN, INC.
SCOTT'S SPLASH LAGOON, INC.

SEAN PIERCE, INDIVIDUALLY AND IN
HIS CAPACITY AS A TROOPER OF THE
PENNSYLVANIA STATE POLICE

JOHN DOE, INDIVIDUALLY AND IN HIS
CAPACITY AS THE SUPERVISOR OF THE
PENNSYLVANIA STATE POLICE,

Defendants.

DEFENDANT'S, SCOTT'S ECONO INN, INC., INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE PLAINTIFF

Defendant, Scott's Econo Inn Inc., hereby make demand that the plaintiff answer the following Interrogatories under oath. These Interrogatories shall be deemed continuing, so as to require supplemental answers if affiant, or anyone on his, her or their behalf obtains further information between the time the answers are served and the time of trial. If more than one plaintiff is named, please answer separately for each plaintiff. If a minor plaintiff is involved, the following Interrogatories, where applicable, are to be answered with reference to the claim of the said minor. Defendants demand answer within thirty (30) days of service as required by the Rules of Civil Procedure.

1. Please provide the current address and telephone number(s) for Tracey Smith.

ANSWER:

EXHIBIT "B"

2. If the above information is unknown to you, provide the addresses at which Ms. Smith resided for the last three years.

ANSWER:

3. Kindly provide any information which may assist the Defendant in locating Tracey Smith, including:

- a. Date of birth;
- b. Place of birth;
- c. Social Security Number;
- d. Any other name(s), including, nicknames and aliases by which Tracey Smith has been known; and,
- e. The names, addresses and telephone numbers of any family member or friends who may be able to provide information regarding the present whereabouts of Tracey Smith.

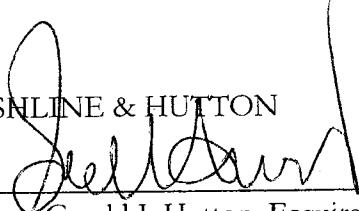
ANSWER:

4. Provide the name(s) and address(es) of any persons or companies who employed Ms. Smith for the last three years.

ANSWER:

5. Kindly provide copies of any documents or records in your possession that support the information provided in response to Interrogatories 1 to 4 above.

ANSWER:

BASLINE & HUTTON
BY: 
Gerald J. Hutton, Esquire
Counsel for Defendant,
Scott's Econo Inn. Inc

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing DEFENDANT SCOTT'S ECONO INN, INC.'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF was served via U.S. First Class Mail, postage prepaid, on this 14th day of December, 2005, upon the following counsel of record:

A.J Adams, Esquire
602 West 9TH Street
Erie, PA 16502
(Attorney for Plaintiff)

Christian D. Barefoot, Esquire
OFFICE OF ATTORNEY GENERAL
6th Floor Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219
(Attorney For Trooper Sean Pierce)

Gary D. Bax, Esquire
900 State Street, Suite 202
Erie, PA 16501
Attorney For Scott's Splash Lagoon, Inc.)

BASHLINE & HUTTON

By 

GERALD J. HUTTON, ESQUIRE
PA I. D. # 23098
Attorneys for Scott's Econo Inn Inc

BASHLINE & HUTTON
Suite 3500, One Oliver Plaza
210 Sixth Avenue
Pittsburgh, PA 15222
Telephone: (412) 434-0201
Fax: (412) 434-0521